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Washington, DC 20405

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October 27, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Subject: Federal-State Joint Board on Universal Service, and Forward Looking Mechanisms for High Cost Support for Non-Rural LECs
CC Docket Nos. 96-45 and 97-160

Dear Mr. Caton:

Enclosed please find the original and seven copies of the General Services Administration's Reply Comments for filing in the above-referenced proceeding.

Sincerely,

Michael J. Ettner

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Senior Assistant General Counsel
Personal Property Division

Enclosures

cc: Sheryl Todd, Competitive Pricing Division (9 copies and diskette)
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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of	
Federal-State Joint Board on Universal Service	CC Docket No. 96-45
Forward-Looking Mechanism for High Cost Support for Non-Rural LECs	CC Docket No. 97-160

REPLY COMMENTS on SECTION III-C-6 of the GENERAL SERVICES ADMINISTRATION

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October 27, 1997

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Summary

GSA advocates procedures that will produce the most accurate estimates of the costs to be incurred in providing services eligible for universal service support. Accurate estimates of future asset lives and future net salvage percents are critical for estimating these costs. GSA concurs with the Commission that its own prescribed service lives and net salvage percents will produce estimates that best reflect the future impacts of competition and technological change.

In these Reply Comments, GSA responds to unsupported assertions that the Commission's lives and net salvage percents are not appropriate because they are not "forward–looking." Specifically, GSA addressees one commenter's contentions that use of the parameters specified by the Commission will lead to reserve deficiencies, and that competitive pressures justify even shorter service lives.

In these Reply Comments, GSA explains that no party has specified guidelines for service lives and net salvage percents that are more defensible or more credible than the parameters recently specified by the Commission. Incumbent carriers should not be able to employ the lives used by their "competitors" to specify their own costs.

Finally, GSA stresses the importance of using cost models that allow all users to verify the accuracy of input data and the validity of cost relationships. The Hatfield model meets these objectives, and employs the Commission–prescribed depreciation parameters that will lead to reliable cost estimates.

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REPLY COMMENTS on SECTION III–C–6
of the
GENERAL SERVICES ADMINISTRATION

The General Services Administration ("GSA"), on behalf of the customer interests of all Federal Executive Agencies ("FEAs"), submits these Reply Comments in response to the Commission's Further Notice of Proposed Rulemaking ("FNPRM") released July 18, 1997. In the FNPRM, the Commission requests comments and replies on the appropriate procedures for determining the forward–looking economic costs incurred by non–rural carriers in providing services eligible for universal service support.

I. INTRODUCTION

Pursuant to Section 201(a)(4) of the Federal Property and Administrative Services Act of 1949, as amended, 40 U.S.C. 481(a)(4), GSA is vested with the responsibility to represent the customer interests of the FEAs before Federal and state regulatory agencies. The FEAs require substantial quantities of interexchange and local telecommunications services throughout the nation. From this perspective, GSA

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I. INTRODUCTION

Pursuant to Section 201(a)(4) of the Federal Property and Administrative Services Act of 1949, as amended, 40 U.S.C. 481(a)(4), GSA is vested with the responsibility to represent the customer interests of the FEAs before Federal and state regulatory agencies. The FEAs require substantial quantities of interexchange and local telecommunications services throughout the nation. From this perspective, GSA has consistently supported the Commission's efforts to bring the benefits of competitive telecommunications markets to all consumers.

In its recent Report and Order on Universal Service, the Commission adopted a plan for establishing universal service support mechanisms for rural, insular and high cost areas that is designed to replace the current "patchwork" of implicit subsidies with explicit support based on the forward–looking cost of telecommunications services.[1] GSA provided Comments and Reply Comments in the proceedings culminating in that Order to express its views as an end user with a vital stake in the development of more competition for all services.[2] On October 3, 1997, GSA submitted Reply Comments to address the "platform" issues concerning outside plant investment designated for comments in Section III–C-2 of the FNPRM.[3] On October 17, GSA submitted Comments on Section III–C–6 addressing cost data inputs.[4] In its October 17 Comments, GSA focused on issues concerning projection lives and future net salvage percents.

On October 17,1997, twelve parties in addition to GSA filed comments on the designated issues — AirTouch Communications, Inc.; Aliant Communications Co.; Ameritech; AT&T Corp. and MCI Telecommunications Corp.; Bell Atlantic; BellSouth Telecommunications Inc., US West, Inc., and Sprint Local Telephone Companies; Cellular Telecommunications Industry Association; GTE Service Corporation; People

1 Federal-State Joint Board on Universal Service, CC Docket No. 96–45, *Report and Order*, FCC 97–157, released. May 8, 1997 ("Universal Service Order").

2 CC Docket No. 96–45, Comments of GSA, April 12, 1996; Reply Comments of GSA, May 7, 1996, Comments of GSA, August 2, 1996, Comments of GSA, December 19, 1996, and Reply Comments of GSA, January 10, 1997.

3 CC Docket Nos. 96–45 and 97–160, Reply Comments of GSA, October 3, 1997.

4 *Id.*, Comments of GSA, October 17, 1997.

of the State of California and California Public Utilities Commission; Puerto Rico Telephone Co.; Sprint Spectrum L.P.; and WorldCom.

Among these commenting parties, only GTE Service Corporation ("GTE") and AT&T Corp. and MCI Telecommunications ("AT&T/MCI") submitted comments addressing the depreciation issues identified in Section III–C-6 of the FNPRM.

II. CONTRARY TO ONE COMMENTER'S CLAIM, THE COMMISSION'S PRESCRIBED LIVES AND NET SALVAGE PERCENTS ARE FORWARD–LOOKING.

In its Universal Service Order, the Commission concluded that the lives used to calculate the forward–looking economic costs of providing universal service should be within the ranges currently specified in the Commission's rules.[5] GTE is the only party to disagree with this position.[6] GTE contends that since the Commission's requires that cost models be forward–looking, "economic lives" are the only appropriate measure for depreciation of the incumbent carrier's plant.[7]

Since GTE does not specify what "economic lives" it would recommend, it is not possible to determine whether these lives are forward–looking or not. But one fact is certain — GTE is not correct in its claim that the FCC's prescribed lives look to the past.[8]

As GSA explained in its Comments, the Commission directed its staff to focus on future technological developments and the anticipated programs of telecommunications carriers under its jurisdiction.[9] Recently, the Commission

5 Universal Service Order, para. 250.

6 Comments of GTE, October 17, 1997. pp. 38–40.

7 *Id.*

8 *Id.*, p. 39.

9 Comments of GSA, October 17, 1997, p. 3.

confirmed again that its prescribed lives are forward–looking. In an Order released May 1, 1997, the Commission specifically rejected claims by incumbent carriers that its prescribed lives did not provide for economic depreciation rates.[10] Noting that under its current procedures incumbent carriers have reasonable discretion in establishing their specific depreciation rates, the Commission reiterated that "Commentors in this proceeding have not persuaded us that the depreciation rates we have currently prescribed do not reflect the LEC's depreciation costs."[11]

III. USE OF THE COMMISSION'S LIVES AND SALVAGE PERCENTS WILL NOT RESULT IN RESERVE DEFICIENCIES.

GTE also asserts, without evidence, that forcing incumbent carriers to "continue using artificially low depreciation rates" will cause them to continue to incur a depreciation reserve deficit.[12] GTE does not identify any existing reserve deficiencies at the present time, so that projection of this condition to the future is without any basis whatsoever.

Certainly for GTE, there is no evidence of reserve deficiency. That carrier's market–to–book ratio (on a regulated basis) was 3.4 at the end of 1996.[13] This ratio is higher than that for the Regional Bell Holding Companies, which was 2.48 at the end of 1996.[14] For a regulated utility, a market-to–book ratio of over three does not show the presence of a substantial reserve deficiency.

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10 Comments of AT&T/MCI, October 17, 1997, p. 22.

11 CC Docket No. 94–1, Second Report and Order, released May 1, 1997, para. 63.

12 Comments of GTE, October 17, 1997, p. 39.

13 Hawaii Docket No. 7702, Rebuttal Testimony of Dr. Lee L. Selwyn, pp. 64–65.

14 CC Docket No. 94–1, Comments of AT&T, January 29, 1997, Appendix B, p. 19. Average is after adjustment for SFAS–71 write–offs.

In fact, there is no evidence of significant reserve deficiencies for any major telecommunications carrier. Indeed, as GSA noted, the latest filings by local exchange carriers subject to Commission prescription show that these carriers have a reserve surplus of more than $500 million.[15] Clearly, as a means for preventing deficiencies, adoption of the Commission's forward–looking projection lives and future net salvage percents has been an outstanding success.

IV. GTE DOES NOT DEFINE ITS RECOMMENDED ECONOMIC LIVES, BUT IT APPEARS THAT THEY WOULD LEAD TO EXCESSIVE RECOVERY.

GTE does not specify exactly what lives it would recommend, but claims that they should not be too low, and should not be within the Commission's prescribed range.[16] This description is vague and provides no useful guidance for the Commission. Perhaps more importantly, it portends endorsement of studies sponsored by the Telecommunications Technology Forecasting Group, an association of local exchange carriers in the United States and Canada.

Local exchange carriers have referred to studies conducted by this group in state regulatory proceedings in an attempt to justify unreasonably short lives.[17] Paramount among the assumptions in these studies is that local exchange carriers will replace their narrow band telecommunications networks with broadband integrated networks capable of providing both telecommunications services and cable television services.[18]

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15 Comments of GSA, October 17, 1997, p. 5.

16 Comments of GTE, October 17, 1997, pp. 38–40.

17 See, for example, Rebuttal Testimony of Richard B. Lee in Hawaii Docket No. 7702, pp. 3–6.

18 Depreciation Lives for Telecommunications Equipment, Review and Update, by Lawrence K. Vanston and Ray L. Hodges, pp. 2, 6 and *passim*.

As GSA explained in its Comments, plant lives used for universal service calculations should not be based on the assumption that efficient telecommunications plant will be retired prematurely in order to provide broadband services.[19] Broadband services are not "supported" services. The use of shorter lives reflecting the carrier's choice to provide these services would unnecessarily burden the universal service program.[20]

V. GTE MAKES NO ATTEMPT TO EXPLAIN ITS DISAGREEMENT WITH THE USE OF WEIGHTED AVERAGES OF PROJECTION LIVES AND FUTURE NET SALVAGE PERCENTS.

In its FNPRM, the Commission tentatively concluded that it should recognize depreciation expenses that reflect a weighted average of the rates authorized for carriers regulated by the Commission.[21] GTE objects to the use of weighted averages, without explanation.[22] Presumably, the carrier seeks the flexibility to fabricate its own procedures for support of unreasonably short lines and unreasonably low salvage percents.

In its Comments, GSA recommended that the projection lives specifically prescribed for each carrier be employed whenever possible.[23] If carrier or state–specific parameters are not available, a weighted average of all Commission–prescribed projection lives and future net salvage percents should be used as a surrogate. However, as GSA explained, a weighted average of currently prescribed

19 Comments of GSA, October 17, 1997, pages 6–8.

20 *Id.*

21 FNPRM, para. 152.

22 Comments of GTE, October 17, 1997, p. 38.

23 Comments of GSA, October 17, 1997, p. 6.

depreciation rates should not be used in forward–looking cost studies, since the rates are designed to apply to the embedded plant balances.[24]

VI. COMPETITIVE PRESSURES DO NOT JUSTIFY SHORTER ASSET LIVES.

GTE asserts that with introduction of competition into the local market, recovery of investment "is no longer guaranteed."[25] Thus, according to GTE, incumbent carriers must be allowed to use the same depreciation rates as other competitive service providers.[26]

In the first place, GTE draws a distinction when there is no difference. Recovery of investment was never guaranteed. Even under "traditional" rate base/rate of return regulation, carriers were given only an opportunity to earn a designated return.

Furthermore, as AT&T/MCI observes:

> There is no significant local competition in most areas of the country today, and it remains uncertain when and even whether significant facilities–based competition will occur in many areas, including the rural and high cost areas most relevant for universal service purposes.[27]

Indeed, even if a few customers are lost to facilities–based competitors, growth in customer demand will almost certainly guarantee continued need for the incumbent's network facilities. As AT&T itself discovered following divestiture of the regional Bell Operating Companies, a decrease in market share does not necessarily mean that the absolute volume of business will decline.[28] In fact, AT&T/MCI explain in their

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24 *Id.*

25 Comments of GTE, October 17, 1997, p. 39.

26 *Id.*

27 Comments of AT&T/MCI, October 17, 1997, p. 22. Emphasis in original.

28 *Id.*, p. 23.

comments that competition may actually increase asset lives because service providers will have additional incentives to earn the greatest possible profit from the network components they have already deployed.[29]

VII. COMMISSION–PRESCRIBED LIVES ARE USED IN THE HATFIELD MODEL TO PRODUCE ACCURATE COST ESTIMATES.

In their Comments on Designated Input and Platform issues, AT&T/MCI provide detailed descriptions of the benefits of using the Hatfield Model to develop cost data for incumbent local exchange carriers.[30] As AT&T/MCI observe, one of the premier features of the Hatfield Model is the fact that this model uses weighted averages of the Commission's asset lives.[31] AT&T/MCI explain that these lives are used because they reflect a reasonable and balanced assessment of the level of competition that may be faced by incumbent local exchange carriers.[32]

In its October 3, 1997 Comments, GSA explained that a model not depending on "proprietary" data has important advantages from the standpoint of an end user of telecommunications services. The absence of proprietary data leads to more accurate and unbiased estimates of costs, because the Commission staff, other carriers, and intervening parties are able to verify the accuracy of input data and the validity of the cost relationships used in the models.

AT&T/MCI explain in their comments that the Hatfield model uses inputs and analytical procedures that are not proprietary and open to public review.[33] Since the

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29 Comments of AT&T/MCI, October 17, 1997, p. iv.

30 *Id., passim.*

31 *Id.*, p. iv.

32 *Id.*

33 *Id.*, pp. 4–13.

model also employs the Commission–prescribed lives and net salvage values, GSA urges the Commission to rely on this approach in developing universal service cost estimates.

VIII. CONCLUSION

As a major user of telecommunications services, GSA urges the Commission to implement the recommendations in these Reply Comments.

Respectfully submitted,

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October 27, 1997

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